

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

(1) TONYA DE LA CRUZ,	)	
	)	
Plaintiff,	)	Case No. CIV-17-374-C
	)	
v.	)	JURY TRIAL DEMANDED
	)	
(1) ZURICH AMERICAN INSURANCE	)	Removed from District Court
COMPANY, a foreign for-profit	)	of Cleveland County,
corporation,	)	Case No. CJ-2017-122
	)	
Defendant.	)	

**JOINT STIPULATION OF DISMISSAL WITH PREJUDICE**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the Plaintiff, Tonya De La Cruz, and the Defendant, Zurich American Insurance Company, hereby stipulate through their respective counsel that this case is dismissed with prejudice to the re-filing thereof, with each party to bear its own costs and attorney fees.

DATED this 6<sup>th</sup> day of July 2017.

s/ Jason Hicks

Chris Hammons, OBA No. 20233

Jason Hicks, OBA No. 22176

**(Signed by Filing Attorney with  
permission of Attorney)**

Laird, Hammons, Laird, PLLC

1332 S.W. 89<sup>th</sup> Street

Oklahoma City, OK 73159

Telephone: 405-703-4567

Facsimile: 405-703-4061

[chris@lhllaw.com](mailto:chris@lhllaw.com)

[jason@lhllaw.com](mailto:jason@lhllaw.com)

*Attorney for Plaintiff*

s/ William D. Perrine

William D. Perrine, OBA No. 11955

Reagan Madison Fort, OBA No. 20761

PERRINE, REDEMANN, BERRY,

TAYLOR & SLOAN, P.L.L.C.

P.O. Box 1710

Tulsa, Oklahoma 74101

Telephone: 918-382-1400

Facsimile: 918-382-1499

[wperrine@pmrlaw.net](mailto:wperrine@pmrlaw.net)

[rmadison@pmrlaw.net](mailto:rmadison@pmrlaw.net)

*Counsel for Defendant*